

**REMARKS/ARGUMENTS**

Favorable reconsideration of this application, in light of the present amendments and following discussion, is respectfully requested.

Claims 10-29 are pending; Claims 1-9 are canceled; and Claims 10-29 are newly added. As Claims 10-29 correspond to the canceled subject matter of Claims 1-9, placed in non-multiple dependent form and written to better comply with U.S. patent practice, it is respectfully submitted that no new matter has been added by this amendment.

In the outstanding Office Action, the drawings were objected to under 37 C.F.R. § 1.83(a); the specification was objected to; Claims 1-9 were objected to; and Claims 1-9 were rejected under 35 U.S.C. § 103(a) as unpatentable over Ross (U.S. Pat. No. 5,983,384) in view of Doetsch et al. (U.S. Pat. No. 6,571,366, hereafter Doetsch).

With regard to the objection to the drawings, the noted informalities have been corrected. It is therefore respectfully requested that this objection be withdrawn.

The Abstract of the Disclosure has also been amended to remove the noted informalities. It is therefore respectfully requested that the objection to the Abstract be withdrawn.

Regarding the objection to Claims 1-9, Claims 1-9 have been canceled herewith, thereby rendering that objection moot.

As for the statement at page 2, paragraph numbered 3, of the outstanding Office Action that "English translation for the IDS is required when the Applicant is responding to the office action," that requirement is respectfully traversed. As stated in MPEP § 706.02, "if the document is in a language other than English and the Examiner seeks to rely on that document, a translation must be obtained so that the record is clear as to the precise facts the Examiner is relying upon in support of their rejection." The Applicants are not required to submit a translation of the references cited by IDS. If the Examiner believes that these

references are material or seeks to rely upon these references in a rejection, the Examiner must provide the translations.

Turning to the rejection of Claims 1-9 under 35 U.S.C. § 103(a), Claims 10-29 correspond to the canceled subject matter of Claims 1-9. For the reasons discussed below, the outstanding rejection of the subject matter of Claims 1-9 is traversed. Claim 10, from which Claims 11-29 depend, recites in part “correcting at least one transmission error based on the certain redundancy.”

As described in the specification in the non-limiting description at pages 1-2, the channel coding device has an error correcting coding function. The error correcting coding function includes generating for a useful information item a redundant information item, which upon decoding at a destination, enables the useful information to be reconstituted from the information arriving at the destination. This redundant information is useful in reconstructing the useful information, especially when the useful information has been damaged by noise, attenuation, and interference. With redundant information introduced by the coding device, the decoding device will use the redundant information received and its knowledge of coding principles to correct any errors. In other words, at the destination, the corresponding useful information is reconstituted from damaged received information. Because of the redundancy, only certain coded information sequences, conforming to principles of coding, are possible. If received information sequences to be decoded are different from these possible sequences, it is because they correspond to information that was damaged during transmission on the channel. The decoding method will reconstitute the useful information by determining the most likely useful information sequence, based on the redundant information.

Ross relates to turbo-coding with a staged data transmission and processing. Ross describes that in addition to a set of code bits generated by an encoder using a turbo-coding

scheme, a punctured set of code bits is generated and stored in transmitter memory.<sup>1</sup> Ross further describes that the receiver decodes the data packet using a turbo-decoder and determines whether the data packet has been received in error. Also, Ross describes that the received data samples are maintained in a memory, and a request for more information is made.<sup>2</sup> However, Ross does not disclose or suggest correcting at least one transmission error based on a certain redundancy generated during coding, as recited in Claim 10 of the present application.

It is respectfully submitted that Doetsch fails to remedy the defects above-noted with regard to Ross. Doetsch relates to a method for packet transmission in a digital transmission system. Doetsch describes utilizing a punctured turbo code with a variable coding rate and turbo-decoding in a turbo decoder at a receiver end.<sup>3</sup> Doetsch further describes requesting coded packets incorrectly sent by the receiver via a return channel and constituting additionally transmitted information when an incorrectly coded packet is re-transmitted.<sup>4</sup> The additionally transmitted information is then inserted into the already existing information at the receiver end.<sup>5</sup> As Doetsch describes error correction by requesting further transmission and inserting the additionally transmitted information, it is evident that Doetsch does not disclose or suggest “correcting at least one transmission error based on the certain redundancy.”

Consequently, as neither Ross nor Doetsch, either alone or in combination, discloses or suggests the features recited in Claim 10, it is respectfully submitted that Claim 10 patentably distinguishes over both Ross and Doetsch. Likewise, it is respectfully submitted

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<sup>1</sup> Ross, Abstract.

<sup>2</sup> Id.

<sup>3</sup> Doetsch, col. 2, lines 46-55.

<sup>4</sup> Id. at lines 55-60.

<sup>5</sup> Id. at lines 60-63.

that dependent Claims 11-29 patentably distinguish over Ross and Doetsch for the reasons above set forth with regard to Claim 10.

Moreover, it is respectfully submitted that there is no basis in the teachings of either Ross or Deutsch to support the applied combination. Certainly, the Office Action fails to point to specific teachings in Ross and Doetsch to support the applied combination. It is therefore respectfully submitted that the applied combination of Ross and Doetsch is based solely upon hindsight reconstruction, and that it is therefore improper.

Consequently, in view of the foregoing discussion and present amendments, it is respectfully submitted that this case is in condition for allowance. An early and favorable action is therefore respectfully requested.

Respectfully submitted,

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